

EXHIBIT A

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September 6, 2006

Robert J. Benson, Esq.
Hogan & Hartson L.L.P.
1999 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067

Via Facsimile

Re: Honeywell LCD
Our File No. 019896-0229

Dear Mr. Benson:

Based on the statements in your letter of September 6, 2006, it is clear that SEC gathered the documents Honeywell requested regarding SEC's LCD modules long ago. Despite that, SEC has yet to produce a single document. According to your letter, SEC now has to undertake the "tedious" task of reviewing the documents that have already been collected to segregate those documents that relate to the modules that Honeywell has specifically identified. Your position is untenable.

First, there is no need to segregate the documents. Since SEC has already completed the task of compiling the requested documents for all of SEC's LCD modules, all of these documents should be produced immediately. Both parties would save substantial time and money if all of the documents are produced at this time.

In addition, your admission that SEC has already compiled the requested documents completely undermines your assertions to both Honeywell and the Court that SEC could not figure out the scope of this case. Clearly, SEC had no problem understanding Honeywell's discovery requests, since it was able to provide the requested documents to your firm. At a minimum, there is no basis on which SEC could not have already produced documents regarding those LCD modules Honeywell identified in the early stages of this lawsuit.

Finally, you now indicate that SEC will only produce as many documents as possible by September 30, and that you will continue to produce documents on a rolling basis thereafter. This is unacceptable. To maintain the deadlines under the current Scheduling Order, Honeywell must have complete productions no later than September 30, particularly since you now indicate that many of the documents are not in English. Honeywell must have sufficient time to translate and review the documents before it can begin scheduling depositions. Since SEC has already completed the task of collecting the documents, there is no reason why the production cannot be completed by September 30.

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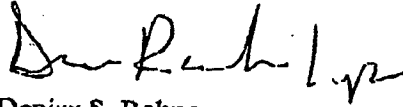
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Regards,

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.



Denise S. Rahne

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